

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF SOUTH CAROLINA

COLUMBIA DIVISION

BRIAN BOWEN, II,)	C/A No.: 3:18-cv-3118-JFA
)	Hon. Joseph F. Anderson, Jr.
Plaintiff,)	
)	
vs.)	
)	
ADIDAS AMERICA, INC.;)	
JAMES GATTO; MERL CODE;)	
CHRISTIAN DAWKINS; MUNISH)	
SOOD; THOMAS GASSNOLA; and)	
CHRISTOPHER RIVERS,)	
)	
Defendants.)	
_____)	

DEFENDANT, CHRISTIAN DAWKINS,
RESPONSE TO PLAINTIFF'S COMPLAINT

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NOW COMES Defendant, Christian Dawkins, by and through his undersigned counsel, and for his response to Plaintiff's Complaint, states as follows:

I. INTRODUCTION

1. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.
2. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.
3. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.
4. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.
5. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.
6. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

7. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

8. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

9. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

10. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

II. JURISDICTION AND VENUE

11. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

12. Defendant, Christian Dawkins, denies the allegations in this paragraph because Defendant, Christian Dawkins evidences no contacts, minimum or otherwise, to the State of South Carolina, therefore this Court lacks personal jurisdiction for the purposes alleged herein.

13. Defendant, Christian Dawkins, denies the allegations in this paragraph because Defendant, Christian Dawkins evidences no contacts, minimum or otherwise, to the State of South Carolina. Further, none of the alleged actions in this matter, asserted to have occurred in the State of South Carolina, relate in any manner to Christian Dawkins.

III. PARTIES

14. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

15. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

16. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

17. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

18. Deny. Defendant Christian Dawkins is not a resident of Michigan. Neither is he a “self-proclaimed athlete advisor”. Deny the balance of the allegations leaving the Plaintiffs to their strictest proofs.

19. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

20. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

21. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

IV. FACTUAL BACKGROUND

A. The NCAA's \$20,000,000,000 Product

22. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

23. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

24. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

25. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

26. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

27. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

28. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

B. Amateurism is the Core of the NCAA's product

29. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

30. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

31. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

32. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

33. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

34. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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36. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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38. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

39. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

C. The \$25 billion Sneaker Industry

i. Origins of the Sneaker Industry

41. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

42. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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54. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

ii. Adidas Infiltrates Amateur Athletics

55. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

56. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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67. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

iii. The Outsized Influence of Adidas-Sponsored Grassroots Basketball

68. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

69. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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74. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

D. The “University of Adidas at Louisville”

75. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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84. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

V. SDNY CRIMINAL INVESTIGATION

85. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

86. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

87. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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100. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

101. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

102. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

VI. OVERVIEW OF DEFENDANTS' RACKETEERING ACTIVITY

A. The Adidas "Black Ops" Bribery Enterprise

103. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

104. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

105. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

106. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

107. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

108. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

109. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

110. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

111. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

112. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

113. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

114. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

115. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

116. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

117. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

B. The Adidas Bribery Enterprise Engaged in a Pattern of Racketeering Activity

118. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

119. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

120. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

121. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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123. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

124. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

i. Racketeering Activity Involving North Carolina State University

125. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

126. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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131. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

132. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

ii. Racketeering Activity Involving the University of Kansas

133. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

134. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

135. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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141. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

142. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

143. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

144. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

145. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

146. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

iii. Racketeering Activity Involving the University of Miami

147. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

iv. Racketeering Activity Involving the University of Louisville that Injured Plaintiff Brian Bowen

148. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

149. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

150. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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156. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

157. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

158. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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167. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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179. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

VII. MONEY LAUNDERING CONSPIRACY IN FURTHERANCE OF THE ENTERPRISE'S PREDICATE ACTS

180. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

181. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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212. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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216. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

217. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

COUNT I

**Violation of § 1962(c) of the Racketeer Influenced and Corrupt Organizations Act (RICO)
Provisions of the Organized Crime Control Act of 1970
Against All Defendants**

218. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

219. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

220. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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222. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

223. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

224. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

225. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

226. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

27. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

COUNT II

**Violation of § 1962(d) of the Racketeer Influenced and Corrupt Organizations Act (RICO)
Provisions of the Organized Crime Control Act of 1970
Against All Defendants**

228. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

229. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

230. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

231. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

232. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

233. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

234. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

235. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

COUNT III

Violation of § 1962(a) of the Racketeer Influenced and Corrupt Organizations Act (RICO) Provisions of the Organized Crime Control Act of 1970 Against Defendant Adidas

236. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

237. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

238. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

239. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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242. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

243. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

244. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

COUNT IV

**Violation of § 1962(d) of the Racketeer Influenced and Corrupt Organizations Act (RICO)
Provisions of the Organized Crime Control Act of 1970
Against Defendant Adidas**

245. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

246. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

247. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

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251. Defendant, Christian Dawkins, neither admits nor denies the allegations in this paragraph because Defendant, Christian Dawkins, lacks information and knowledge sufficient to form a belief as to the truth of the claims and leaves Plaintiff to its strictest proofs.

RELIEF REQUESTED

WHEREFORE, Defendant, Christian Dawkins, respectfully prays that this Court dismiss Plaintiff's Complaint and award attorney fees and costs so wrongly incurred.

RELIANCE ON JURY DEMAND

WHEREFORE, Defendant, Christian Dawkins hereby relies on the jury demand of the Plaintiff.

HANEY LAW GROUP, PLLC
/s/Steven A. Haney, Sr.
Steven A. Haney, Sr. (P63947)
Attorney for Defendant, Dawkins
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(248) 414-1470
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FINGER, MELNICK & BROOKS, P.A.
/s/ Terry A. Finger
Terry A. Finger, Local Counsel
Federal Bar Number: 00813
35 Hospital Center Commons, Ste. 200
Hilton Head Island, SC 29925
(843) 681-7000
tfinger@fingerlaw.com

Dated: February 22nd, 2019

PROOF OF SERVICE

I hereby certify that on February 22nd, 2019, I served Defendant, Christian Dawkin's Answer to Plaintiff's Complaint and this Certificate of Service to all counsel of record via the Court's e-filing.

Respectfully submitted,
/s/ Steven A. Haney
Steven A. Haney (P63947)